

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

PAULA AMBER CHISHOLM,

Defendant.

Case No. CR-21-194-RAW

**GOVERNMENT’S RESPONSE OPPOSING DEFENDANT’S MOTION TO CONTINUE
JURY TRIAL**

This Court should deny the Defendant’s motion because it would result in the third continuance of the trial date. The Government and the defense have previously agreed on two continuances of the trial date [Docket Nos. 26 and 38]. The original trial date was July 6, 2021 [Docket No. 22]. A continuance was requested by the Defendant and the court reset the jury trial to October 5, 2021 [Docket No. 38]. A second request for continuance was made by the Defendant and a jury trial is now scheduled to begin on February 1, 2022 [Docket No. 38]. The Government and its witnesses are now prepared to proceed to trial, so the Government respectfully opposes this motion.

The Defendant requests additional time to allow their expert time to generate a report. The government has previously complied with its discovery obligations and all of the discovery in this case was provided to the Defendant over four months ago. It is the Government’s position that the Defendant has had sufficient time to hire an expert and have a report generated.

WHEREFORE, the Government respectfully requests that the Defendant’s motion be denied.

Respectfully submitted,

CHRISTOPHER J. WILSON
United States Attorney

s/ Morgan Muzljakovich
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CERTIFICATE OF SERVICE

I hereby certify that on December 21, 2021, I electronically transmitted the attached documents to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrant:

Sarah Erlinder
Counsel for Defendant

s/ Morgan Muzljakovich
Morgan Muzljakovich
Assistant United States Attorney